

REMARKS

Applicants have canceled claims 12 and 19 and rewritten claim 20 as an independent claim (as well as amending it as suggested by examiner). Claims 13 and 14 have been amended to depend on claim 20. No substantive amendments have been made, and the claims are presented as being in condition for allowance.

In the final office action of December 11, 2006, examiner objected to applicants' use of the word "apparatus" in characterizing their invention. While applicants see no statutory or case law basis for this objection, they also find the terms to be synonymous. Thus, to remove an incidental item and cooperatively advance the prosecution by focusing on the real issues of the application, they have amended the claims as examiner has suggested. In substituting a term for its synonym, the applicants do not intend to introduce any change whatsoever in the scope or meaning of the claim, and the applicants consider the objection now moot.

Claim 20 stands rejected under 35 USC 102(b) as anticipated by the teachings of Akram (US 6,127,736). Applicants traverse this rejection. In claim 20, applicants recite that "the attachment material is an electrically conductive adhesive." Examiner states, as his reason for the rejection, only that "solder is conductive." This statement is wholly irrelevant to applicants' claim recitation, which does not recite or read on "solder."

Applicants define and describe "conductive adhesive" in their application as filed (paragraphs [0054] and [0056]. Examiner should notice specifically the first sentence of paragraph [0054] which specifically contrasts a conductive adhesive with solder: "Alternatively, conductive adhesive joints may be used in place of solder joints." In addition, applicants describe "conductive adhesive" in these paragraphs as "resin based" with conductive particles and provide numerous examples of such materials. Solder does not fit this description, since

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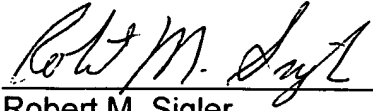
it is a metal alloy. Furthermore, applicants' claims 19 and 20 were species claims with parallel dependence on claim 12, with claims 19 and 20 being identical except that claim 19 recited "solder" and claim 20 recited "conductive adhesive." This was intentional, since applicants consider and refer to solder and conductive adhesive as different materials, with different properties. Thus, it should be clear in the specification and claims that applicants did not intend use of the term "solder" as a subgroup of "conductive adhesive" but defined and used the terms as alternative species. Although examiner has the right and duty to read applicants claims as broadly as the language allows, such reading, under law, must be reasonable and consistent with the definitions provided in applicants' specification (which includes the claims as filed).

Thus, applicants assert that examiner's rejection of claim 20 under 35 USC 102(b) is unsupported and requests its withdrawal. Since claim 20 has been rewritten in proper independent form, and all other claims presented are dependent on claim 20, applicant submits that the claims are in condition for allowance.

Applicants point out that they have not amended their claims except as suggested by examiner ("device" for "apparatus") and to rewrite claim 20 as an independent claim and make changes in dependency of several dependent claims necessitated by the rewrite of claim 20. Thus applicants' amendment has narrowed the claims but not introduced any new issues. The only issue that is introduced is in applicants' arguments; and that is examiner's interpretation of the term "conductive adhesive" in applicants' claim 20. This issue is confined to the application itself and is based on what applicants believe is a misreading of the claim by examiner. After consideration, if examiner accepts applicants' arguments but still believes that claim 20 is unpatentable over the prior art on a different ground, applicants request that examiner enter this amendment and issue a new office action without requiring applicant to file an RCE.

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Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Robert M. Sigler", written over a horizontal line.

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